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ABC Rail Products Corporation
2001-45 Winchester St.
Baltimore, Md. 21216

MDD 003063930

Date of Inspection: February 9, 1999

I. Introduction:

An unannounced Compliance Evaluation Inspection (CEI) was performed at this facility to determine compliance with the Maryland hazardous waste regulations. The company is listed in the EPA RCRIS database as a large quantity generator (LQG), indicating that more than 1000 Kg of hazardous waste is generated each month.

II. Representatives Present:

Tony Chickerell, Plant Manager, ABC Rail (410) 669-3272 FAX (410) 383-0422
Bob Deugwillo, ABC Rail (handles waste disposal)
Doug Frantz, inspector, Hazardous Waste Enf. Div., MDE
Trenton London, inspector, Hazardous Waste Enf. Div., MDE

III. Facility Description:

This plant, located in west Baltimore, has been operated by ABC Rail since about 1988. ABC Rail has 19 plants in the U.S., but only this plant produces cast iron railroad brake shoes. Effective February 19, 1999, ABC Rail will be merged into North American Casting Company, and will be part of a worldwide operation. Before 1988, this plant was operated by American Brake Shoe and by Abex, Inc.

This operation consists of a cupola furnace that produces molten iron for casting into railroad brake shoes. Molds are produced from foundry sand and binder, and "extras" are placed into the finished mold before the molten iron is poured into the mold. The "extras" are steel parts that become part of the finished shoe, along with the cast iron. Extras include a strip of expanded steel mesh which is imbedded in the cast iron, a steel back, and a steel lug, which is the point of attachment to the brake system. These extras are manufactured by other companies, and are received here ready to be placed in the molds.

Demand for cast iron brake shoes has decreased as composite brake shoes have come into use, but there are still many railroads which use the cast iron shoes.

We met with Mr. Chickerell and Mr. Deugwillo, and then Mr. Deugwillo took us on a tour of the operation and answered questions about waste generation and disposal.

IV. Waste Generation:

Air emissions from the cupola furnace are controlled by a baghouse. Dust collected from the baghouse was at one time disposed as hazardous waste due to cadmium and lead content (characteristic waste codes D006, D008). In 1992, the company began using "Bantox®", injected into the exhaust gas stream prior to the baghouse, which causes the baghouse dust to pass the TCLP test for lead and cadmium. This means that the dust can be disposed as non-hazardous waste. The use of the "Bantox®" is <u>not</u> hazardous waste treatment requiring a permit, because it meets the definition of a totally enclosed treatment facility, which is connected directly to an industrial production process. ABC periodically tests the baghouse dust using the TCLP method

to confirm that the material is non-hazardous. The most recent sample was obtained on Jan. 15, 1999, and results are pending.

The company processes used molds to recover a large portion of the foundry sand for reuse, but some waste sand is still generated. Waste foundry sand, furnace slag, and baghouse dust are stockpiled together on the ground at the south end of the plant. These materials are removed by Westport Reclamation Services, Inc.

Feed material to the cupola furnace is mainly scrap metal and coke. Lead and cadmium in the baghouse dust comes from contaminants in the scrap metal.

Used oil is generated from maintenance of forklifts, and hydraulic systems. Eight 55-gallon drums of used oil were staged outside the oil storage room, awaiting pick-up today. Two additional drums are still awaiting the results of testing to confirm that they do not contain any constituents above the levels permitted in used oil (e.g., halogenated solvents). ABC does not use any halogenated solvents except trace amounts which may be in spray can cleaners (no liquid waste generated). Although used oil has been stored in drums up to this point, a 275-gallon tank has now been designated for used oil, and Safety Kleen will be pumping from this tank in the future. New lube oils are stored in the same room with the used oil tank. Mr. Deugwillo reported that this room is to be upgraded to include secondary containment for the oil storage.

The company has two parts washers on site, which use a Zep product, which is labeled as "143°", indicating a flashpoint above 140 degrees F. Mr. Deugwillo reports that Safety Kleen will be taking over the servicing of the parts cleaners. He reports that parts washers have not been serviced previously, only fresh solvent is added as needed.

In recent years, the company has generated some "one-time" hazardous waste streams. Removal of an underground gasoline storage tank resulted in some hazardous waste. Changeover to a new binder for the mold making resulted in the disposal of stocks of old binder chemical in 55-gallon drums.

V. Generator Status:

Although the company is not generating more than 1000 Kg of hazardous waste per month, the generator status of the company should probably remain as LQG, in case a sample of the baghouse dust might exceed the TCLP levels. The company appears to be generating very little hazardous waste, well less than 100 Kg per month.

VI. Violations:

There were no violations of the hazardous waste regulations.

VII. Other Notes:

If the company accumulates more than 100 Kg of hazardous waste at any time, that waste must be managed in accordance with the hazardous waste regulations. This would include labeling, secondary containment (for wastes with free liquids), accumulation date on containers, and other requirements. This might occur if used oil is found to have contaminants above the specification levels, or if the baghouse dust fails the TCLP test.

Written by: Douglas E. Frantz, Hazardous Waste Enforcement Division, 410-631-3400

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